

Comments of Conexus.fm – MM Docket 99-25

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC

In the matter of:

)

)

Creation of a Low Power Radio Service

)

MM Docket-99-25

)

)

COMMENTS OF CONEXUS.FM

In response to the Commission's request for comment regarding the LPFM service, please consider the following comments and suggestions.

Upgrade service to 250 watts for new and existing LPFM Stations and Consideration of a waiver system to allow second adjacent waiver filings where a fully spaced LPFM is not available:

This has been a request by many of our LPFM clients since the inception of the LPFM service. As a large percentage of Nexus Broadcast clients are in rural areas, 100 watt service just doesn't cover the larger spread out rural areas. 100 watts in a compact city area could cover thousands of people. In rural areas those thousands of people may be spread over a 10 – 20 mile radius. 250 watts would allow rural LPFM a better advantage when it comes to serving their community and remaining financially viable. We use rural areas as an example, however even in larger cities, sometimes a transmitter location cannot be located centrally due to spacing limitations or zoning issues. This can place the transmitter site miles from the desired location, with 250 watts this could mediate some of these situations. The translator service has operated very well with a 250 watt cap with no issues. As these are generally un-manned operations, why wouldn't the LPFM service which is manned and monitored be acceptable for these same power levels? Conexus.fm and Nexus Broadcast would like to see the power ceiling on the LPFM service raised to 250 watts and 100 meters HAAT as opposed to the current proposed 250 watts 30 meters. This would create a much more viable service for a service that is directly serving their communities as compared to a translator which is merely repeating programming from a distant location. These regulations in retrospect seem backwards. Contour spacing for LPFM would allow greater coverage and a greater ability to serve their communities. This would provide a more reliable service throughout their coverage areas. Also let us refer to the original Leggett petition which requested power levels as high as 1000 watts. We understand the reduction of power and 'buffer zones' were added as a compromise in reaction to the NAB's and full power broadcasters incessant attacks against the proposed LPFM service. If it weren't for this interference from such entities the service would have likely began as a 1000 watt and 100 watt service.

(CONTINUED ➔)

Comments of Conexus.fm – MM Docket 99-25

Removal of LP-10 CClass - replacing with LP-250 Class:

Conexus believes that the LP-10 service never received a fair chance since no filing windows have ever been opened for this service. There are many smaller projects such as colleges, schools, etc that do not desire or need the coverage of a 100 watt service. We cannot determine the need for such services without first giving an opportunity for them to apply.

With that said, we feel the 50 watt service as proposed by Recnet is a better solution and a good compromise as opposed to completely dropping the LP10 service. We suggest the Recnet 50 watt class is the best solution. However another commenter suggests the contour based spacing model used for translators. He suggests one single class of LPFM. “This class can include LPFM stations of from as little as 1 watt to as much as 250 watts or any level between the two. This model has been used successfully in the allocating of translators for years now and can be used just as successfully (and easily) with virtually no "re-tooling" at the commission. It is a simple "tried and true" method that has been shown to work. “

Conexus is in agreement with his proposal. This would allow streamlining of the LPFM service, making processing applications more expeditious and efficient.

Removal of I.F. Channel Minimum Distance Separation Requirements:

Due to improvements in receiver technology over the years, the need for IF protection with low output power is no longer necessary. This is a rule that should have been removed from the rules long ago.

Requirement That Applicant Be Community-Based:

Our experience with clients with most being rural based has shown the requirement that board members reside within ten miles of the transmitter site to be overly restrictive and burdensome. Though some sort of restriction should continue to be in place, we suggest a less restrictive limit of 20 miles. This also aids new stations and those requiring to move more flexibility in locating a transmitter site.

Cross-Ownership (LPFM stations / Translator Stations):

Access to translators can make a world of difference of the ability of an LPFM to reach its target audience. Conexus supports cross ownership of Translators where the translator will be used for the LPFM station holding that license. Many times an LPFM’s audience will spill over to a neighboring community where the main signal may be marginal or unlistenable, especially inside buildings. Translators would allow greater penetration to their intended audiences. While LPFM stations may currently be rebroadcast on a ‘friends’ translator, that leaves them open to losing access to that audience at any time due to the whims of the translator owner. Allowing the LPFM station to own the translator would make the service more reliable and keep the LPFM station in control.